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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
COMMENTS ON DRAFT SAMPLING AND ANALYSIS PLAN FIELD SAMPLING PLAN AND
QUALITY ASSURANCE PROJECT PLAN FOR EXPANDED SITE INSPECTION AT BUILDING
3221 NAS PENSACOLA FL
7/23/2013
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

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RICK SCOTT
GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

July 23, 2013

Ms. Patty Marajh-Whittemore
Remedial Project Manager
ITP Gulf Coast
Naval Facilities Engineering Command Southeast
Attn: AJAX Street, Building 135N
P.O. Box 30A
Jacksonville, FL 32212-0030

RE: Draft Sampling and Analysis Plan (Field Sampling Plan and Quality Assurance Project Plan), Revision 0, Expanded Site Inspection, Building 3221, Naval Air Station Pensacola, Pensacola

Dear Patty:

The Department has reviewed the Draft Sampling and Analysis Plan (Field Sampling Plan and Quality Assurance Project Plan), Revision 0, Expanded Site Inspection, Building 3221, Naval Air Station Pensacola, dated December 2012 (received December 21, 2012), prepared by Tetra Tech, Inc. Overall, the proposed sampling locations and strategy is acceptable to the Department. I have the following comments on the Draft Sampling and Analysis Plan (SAP):

- (1) In Worksheet #6, the Department is left out of the communication pathways for Work Plan Amendments, field issues that require changes in scope, and laboratory data quality issues.
- (2) On page 27, second bullet on page, it says "If COCs are detected and are not associated with Building 3221 then they can be attributed to anthropogenic activities.". It is unclear how those contaminants could be determined not to be associated with Building 3221 based on the sampling locations proposed in the SAP and what attribution to anthropogenic activities would entail as far as future site cleanup requirements.
- (3) On page 27, sixth bullet on page, first sentence, please replace one of the words "in" with the word "the". In the fourth sentence, please place the word "contaminated" between the words "have" and "adjacent". In the next bulleted item on the page under Action Items:, please remove the first "in" between the parentheses.
- (4) On page 34, third paragraph, please remove the word "as" between the words "was" and "part".

- (5) On page 36, first paragraph, last sentence, please remove the word "been" between the words "have" and "since".
- (6) On page 36, Section 10.2.3, **UST Site 3221 NE**, it identifies a regulatory criteria for TRPH of 50 ppm that was supposedly in effect in 1990, the year the tank was removed. On page 37, Section 10.2.5, **UST Site 3221 SW**, second paragraph, it identifies a Florida regulatory criteria for TRPH of 10 mg/kg, a number that was supposedly in effect in 1993. Please note that excessively contaminated soil at petroleum cleanup sites was often determined using organic vapor analyzers (OVAs) at the time the two TRPH cleanup numbers were in effect. Please verify that it is not OVA concentrations being reported.
- (7) On pag 42, Section 10.3.3.1, first paragraph, first sentence, please revise the beginning of the sentence to read "There is a potential for hazardous substance to migrate . . ."
- (8) On page 57, Section 14.1.3, second paragraph, first sentence, there is a reference to a methodology in Chapter 62-770, F.A.C. Chapter 62-770, F.A.C., has been repealed and the petroleum cleanup criteria incorporated into Chapter 62-780, F.A.C.
- (9) On page 58, Section 14.1.4, second paragraph, second sentence, please replace "1e" with "1". In the third paragraph on the same page, first sentence, please remove the comma between the words "shallow" and "monitoring".
- (10) In Section 14.1.8, **Field Decontamination Procedures**, it states that decontamination will be conducted in "general accordance" with procedures described in USEPA's SOP for Field Equipment Cleaning and Decontamination (SESDPROC-205-R1). It goes on to say that at each sample location an abbreviated decontamination procedure will be performed. Please explain how the decontamination procedure will deviate from EPA's SOP and identify whether any additional quality control samples will be taken in order to verify proper decontamination.
- (11) In SAP Worksheet #18, the three Site 44 water level wells are not identified.

If you have any questions regarding this letter, please contact me at (850) 245-8997.

Sincerely,



David P. Grabka, P.G.
Remedial Project Manager
Federal Programs Section
Bureau of Waste Cleanup

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